

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**ANDREW DOE**

**PLAINTIFF**

**V.**

**CIVIL ACTION NO. 3:18-cv-138-DPJ-FKB**

**STATE OF MISSISSIPPI; THE UNIVERSITY OF  
MISSISSIPPI; STATE INSTITUTIONS OF HIGHER  
LEARNING (“IHL”), ET AL.**

**DEFENDANTS**

**DEFENDANTS’ REBUTTAL SUPPORT OF THEIR  
SUPPLEMENTAL SUMMARY JUDGMENT BRIEF**

Defendants have already addressed the relevant authorities and Plaintiff’s arguments in their Supplemental Brief [Doc. 230] and their Response to Plaintiff’s Supplemental Brief [Doc. 232]. Defendants stand on their prior arguments and incorporate them by reference into this rebuttal.

Dated June 23, 2023.

Respectfully submitted,

**STATE OF MISSISSIPPI; THE UNIVERSITY OF  
MISSISSIPPI; STATE INSTITUTIONS OF HIGHER  
LEARNING (“IHL”); THE BOARD OF TRUSTEES  
OF STATE INSTITUTIONS OF HIGHER LEARNING;  
C.D. SMITH, JR.; SHANE HOOPER; TOM DUFF; DR.  
FORD DYE; ANN H. LAMAR; DR. ALFRED E.  
MCNAIR, JR.; CHIP MORGAN; HAL PARKER;  
ALAN W. PERRY; CHRISTY PICKERING; DR. DOUG  
ROUSE; DR. J. WALT STARR; GLENN F. BOYCE;  
JEFFREY S. VITTER**

*/s/ Paul B. Watkins, Jr.*

J. CAL MAYO, JR. (MB NO. 8492)  
PAUL B. WATKINS, JR. (MB NO. 102348)  
J. ANDREW MAULDIN (MB NO. 104227)  
ATTORNEYS FOR DEFENDANTS

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